

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
BEAUFORT DIVISION**

ADAMS OUTDOOR ADVERTISING  
LIMITED PARTNERSHIP,

Plaintiff,

vs.

BEAUFORT COUNTY, and ERIC  
GREENWAY, Director of the Beaufort  
County Community Development Department,

Defendants.

Civil Action No. 9:21-cv-1517-BHH

**PLAINTIFF'S ANSWERS TO LOCAL  
CIV. RULE 26.01 (D.S.C.)  
INTERROGATORIES**

Plaintiff Adams Outdoor Advertising Limited Partnership ("Plaintiff"), by and through its undersigned counsel, submits the following answers to the Court in response to Local Civ. Rule 26.01 (D.S.C.), and in satisfaction of the requirements of Fed. R. Civ. P. 7.1:

**ANSWERS TO LOCAL CIVIL RULE 26.01 (D.S.C.) INTERROGATORIES**

**(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.**

Plaintiff's Answer: None.

**(B) As to each claim, state whether it should be tried jury or nonjury and why.**

Plaintiff's Answer: Plaintiff has demanded a nonjury trial on all causes of action because the case presents relatively straightforward legal issues which can be most efficiently and cost-effectively resolved by the Court.

**(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent (10%) or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent (10%) or more of the outstanding shares.**

Plaintiff's Answer: The party submitting these responses is not a publicly owned company. As to this interrogatory's subparts: (1) none; (2) none; and (3) none.

**(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civil Rule 3.01 (D.S.C.).**

Plaintiff's Answer: This case is appropriately assigned to the Beaufort Division of the United States District Court for the District of South Carolina pursuant to Local Civ. Rule 3.01(A)(1) (D.S.C.) because a substantial part of the events or omissions giving rise to the claims occurred, and Defendants conducted and do business relating to the events or omissions alleged, in Beaufort County, South Carolina, which is included in the Beaufort Division of the District of South Carolina.

**(E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that *may* be related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.**

Plaintiff's Answer: This action is not related in whole or in part to any other matter filed in this district.

**(F) [Defendants only.] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.**

Plaintiff's Answer: No answer is required from Plaintiff.

**(G) [Defendants only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.**

Plaintiff's Answer: No answer is required from Plaintiff.

[SIGNATURE PAGE FOLLOWS]

s/ Evan P. Williams

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*ATTORNEYS FOR PLAINTIFF ADAMS  
OUTDOOR ADVERTISING LIMITED  
PARTNERSHIP*

May 20, 2021

Mt. Pleasant, South Carolina